
From: John Markham
Sent: Tuesday, July 20, 2021 1:23 PM
To: Luke Nikas
Cc: Bridget Zerner
Subject: RE: Indiana - revised stip

This is all good. Please sign for me and okay to file.

I am easy on any date after 83 and 8/4 as well.

J

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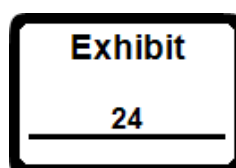
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From: Luke Nikas
Sent: Tuesday, July 20, 2021 1:07 PM
To: John Markham <jmarkham@markhamreadzerner.com>
Cc: Bridget Zerner <bzerner@markhamreadzerner.com>
Subject: Re: Indiana - revised stip

Thanks. I changed the deadline to August 13.

As for the reference to "artwork," correct, I don't intend to inventory all the artwork, because that was basically done before. But I do want to keep that language because I am intending to produce some of those photos as part of the proposed production and I also don't want to be completely precluded from photographing any artwork at our inspection. As a practical matter, however, I believe most if not all of the art photography is done. Please let me know if you can accept this language, with that background understanding. I have attached what I propose to sign (electronically) for both of us and submit to the Court.



I will check my calendar for those dates and, if they don't work others, and will let you know asap. Thanks.

Luke Nikas
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From: John Markham <jmarkham@markhamreadzerner.com>
Date: Tuesday, July 20, 2021 at 11:04 AM
To: Luke Nikas <lukenikas@quinnemanuel.com>
Cc: Bridget Zerner <bzerner@markhamreadzerner.com>
Subject: RE: Indiana - revised stip

[EXTERNAL EMAIL from jmarkham@markhamreadzerner.com]

Luke:

Thanks for drafting this.

Three things:

- No problem with the extra summer clerk;
- This still says "artwork" and it was my impression from our discussion the other day that you were not planning to copy artwork;
- This stipulation provides that this will be done on or before the 1st of August but I thought we were doing this on either 8/4 or 8/5.

I was just been directed out to California having been granted a hearing in a criminal case which is set for July 26 and I have another hearing in California set for July 30. I am trying to merge the 2 (same case) so I can do them both on July 30 but cannot know until the judge moves. So it would work if we could do this on either the 4th or the 5th. If that messes with any personal time then I could do it as soon thereafter as would work for you.

John

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From: Luke Nikas
Sent: Tuesday, July 20, 2021 10:02 AM
To: John Markham <jmarkham@markhamreadzerner.com>
Subject: Indiana - revised stip

John,

Here's a revised stip, in clean version. I addressed McKenzie's presence, accepted your timing on lodging objections, added a fifth QE person to come to the site (I'd like to bring my two summer associates), largely accepted your protective order language, etc. Please let me know if you have any further comments on this. Thanks.

Luke Nikas
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